

DAB

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:12-CR-230-F

UNITED STATES OF AMERICA)	
)	
v.)	<u>STATEMENT OF OFFENSE</u>
)	18 U.S.C. § 1001 (false statements)
)	
AMBER BROWN)	

1. Amber Brown was a registered nurse working at the Federal Medical Center in Butner, NC, part of the Bureau of Prisons (BOP).

2. W.P. and R.A. were inmates at FMC Butner. Both W.P. and R.A. were inmate workers who had interaction with Brown through their work in the medical section of FMC Butner.

3. Brown had custodial and disciplinary authority over any inmate she interacted with at FMC Butner, including W.P. and R.A. Like other BOP employees, Brown had the ability to take action (including physical restraint) to prevent any inmate from escaping and to begin the disciplinary process for any inmate.

4. Brown met W.P. in early 2009. While working with W.P., she had sex with him at least twice.

5. On February 6, 2012, W.P. cooperated with law enforcement officers and wore a wire to conduct an undercover recorded conversation with Brown. W.P. and Brown talked for about 20 minutes. During that conversation, W.P. mentioned his sexual relationship with Brown. Brown did not deny the sexual relationship and agreed that she would not talk to anyone about it.

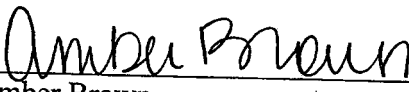
6. Brown also initiated a sexual relationship with R.A. while he was an inmate at FMC Butner, having sex with him at least twice.

7. On February 6, 2012, federal agents, including BOP agents and officials and special agents with the Department of Justice, Office of Inspector General, interviewed Brown with her consent. In that interview, she denied having sexual relations with any inmate. She also claimed she did not remember the last time she spoke to W.P., specifically claiming that she did not remember speaking to W.P. a few hours before the interview.

8. These statements were false because Brown had sexual relations with at least two inmates, W.P. and R.A.

9. These statements were made to officers and agents who were a part of the executive branch of the United States Government and were specifically investigating a violation of 18 U.S.C. § 2243(b) by Brown, a matter within the jurisdiction of the executive branch.

Signed by Amber Brown on the 29th day of June, 2012.


Amber Brown